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23 December 2022

Hon. Renée Marie Bumb
United States District Court
4th & Cooper Streets
Camden, New Jersey 08101
Submitted by CM/ECF

Re: *Koons, et al. v. Reynolds, et al.*
No. 1:22-cv-07464-RMB-EAP

Dear Judge Bumb:

I represent the Plaintiffs in the above-captioned action, which challenges a newly enacted law that severely restricts the places where individuals can carry handguns, notwithstanding that they have qualified for and obtained permits to carry handguns under New Jersey law. *See* 2022 N.J. Laws c. 131, § 7(a)-(b). These restrictions directly contravene the Supreme Court's decision in *New York State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. ___, 142 S. Ct. 2111 (2022). Moreover, these restrictions are effective immediately. *See* 2022 N.J. Laws c. 131, § 12.

I write to advise the Court that Plaintiffs intend to file a motion for a temporary restraining order and a preliminary injunction. While we would have preferred to have waited until after the holiday, the restrictions are (as stated) effective immediately. We are submitting this letter in the hope that it will expedite the scheduling of this matter for resolution. We have included representatives of the various Defendants in copy, and we will send copies of the motion papers to them by e-mail/fax and (if necessary) by overnight courier.

We propose that Defendants submit their opposition papers by Thursday, December 29, 2022, and that Plaintiffs submit their reply papers by Tuesday, January 3, 2022, without oral argument to be scheduled thereafter.

Respectfully submitted,

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